

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ALEXANDER HYLTON, an individual,

Plaintiff,

v.

REEDER MANAGEMENT INC., a
Washington Company,

Defendant.

Case No.: 2:20-cv-01281

**JOINT STIPULATED MOTION AND
ORDER TO EXTEND DEADLINE
TO COMPLETE DISCOVERY**

STIPULATION AND MOTION

Pursuant to LCR 7(d)(1) and 10(g), the parties, by and through their counsel of record, hereby jointly stipulate and move the Court for entry of the proposed order extending the Deadline to Complete Discovery by one month as follows:

Deadline for	Current	Proposed
Expert Witness Disclosure/Reports Under FRCP 26(a)(2) Due	03/22/2021	03/22/2021
Deadline to Complete Discovery	04/21/2021	05/21/2021
All dispositive motions must be filed by	05/21/2021	05/21/2021
All motions <i>in limine</i> must be filed by	09/13/2021	09/13/2021
Joint Pretrial Statement due	09/20/2021	09/20/2021
Pretrial Conference	10/04/2021	10/04/2021
Trial Date	10/18/2021	10/18/2021

JOINT STIPULATED MOTION AND
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COMPLETE DISCOVERY - 1

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The parties have been working diligently and cooperatively to complete all discovery by the original April 21, 2021 deadline. Depositions of fact witnesses have commenced and most of the proposed deponents have been scheduled. Hundreds of pages of documents have been produced. However, the earliest at least one remaining deponent is able to be scheduled is after the current discovery deadline, and supplemental discovery requests may be necessary following this deposition. In spite of the best efforts of the parties it is unlikely that discovery could be completed by the original April 21, 2021 deadline. In order to preserve the finality of the dates set by the Court and to make sure there is enough time to properly complete discovery a short continuance is needed. Accordingly, the parties propose that the deadline to complete discovery be continued and all other pre-trial dates remain unchanged, in accordance with the schedule set forth above. This is the first request for a continuance in this matter and the parties do not foresee a need for any further continuances in the trial and pre-trial schedule.

DATED: March 17, 2021.

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Attorneys for Plaintiff.

Attorneys for Defendant

ORDER

THIS MATTER came before the Court pursuant to a joint motion by Plaintiff and Defendant to extend the deadline to complete discovery in accordance with the schedule set forth below. Having considered the stipulated joint motion and arguments of counsel, the Court finds that there is good cause to extend the Deadline to Complete Discovery as requested in the joint motion.

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IT IS SO ORDERED this 18th day of March, 2021.



Barbara J. Rothstein
United States District Judge